

**UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

IN RE:

TRUE VALUE COMPANY, L.L.C., et al.,  
  
Debtors.

Chapter 11

Case No. 24-12337 (KBO)

(Jointly Administered)

**Re Dkt. No.: 1246**

**DM MERCHANDISING INC.'S WITNESS AND EXHIBIT LISTS FOR EVIDENTIARY  
HEARING OF JUNE 26, 2025**

DM Merchandising Inc. ("**DM**"), submits the following list of witnesses and exhibits in connection with the evidentiary hearing of June 26, 2025, in the above-captioned matter:

**I. Witness List.**

1. Richard Freeman, solely through the *Declaration of Richard Freeman in Support of Response of DM Merchandising Inc. to Debtors' Twelfth Omnibus Objection to Claims* (the "**Freeman Declaration**"), previously filed at Docket No. 1330 at pp. 12-14. DM understands that the parties agree that the Freeman Declaration can be admitted as direct testimony, and will not require the presence of Mr. Freeman in court or any cross-examination, which shall not be deemed as the Debtors agreeing with the facts and statements alleged therein.

**II. Exhibit List.**

1. Those certain screenshots of the Debtors' VendorOnline system showing a sampling of True Value's records for the sales associated with DM's 503(b)(9) claim that were previously attached as Exhibit 1 to the Freeman Declaration, and filed at Docket No. 1330 at pp. 15-23.

2. Those certain invoices associated with DM's 503(b)(9) Claim, previously attached as Exhibit 2 to the Freeman Declaration, and filed at Docket No. 1330 at pp. 24-252.

3. DM's proof of claim previously submitted as Claim No. C337-2874.

DM reserves the right to further amend or supplement these lists at or prior to the hearing, to call any witness designated by any other party, and to introduce into evidence any documents or exhibits designated by any other party.

Dated: June 25, 2025

Respectfully submitted,

**DM Merchandising Inc.**

By: /s/ William J. Factor  
One of Its Attorneys

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